

212-243-1100 • Main
917-912-9698 • Cell
888-587-4737 • Fax

225 Broadway, Suite 715
New York, NY 10007
bcsternheim@mac.com

November 8, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

In response to the Court's order (Dkt. 404), the defense proposes the following suggestions **in bold** to the preliminary remarks to be recorded and played before each voir dire session:

Page 3, Lines 11-12:

You can't assume that she is guilty or more likely to be guilty just because she's been charged **in an indictment and alleged to have committed the crimes charged.** ~~with committing these crimes.~~

Page 4, Lines 12-13:

Another instruction, from today until you are excused from jury service, you can't look up or google or do any kind of **research or search in any manner** about anything related to the case or anyone involved in the case.

Page 4, Following Line 23:

The attorneys and their assistants have been instructed by me not to speak to you or otherwise engage with you. They are not being rude or indifferent. They are merely following my instructions.

Page 5, Line 7:

any communications about the case through any means **or using any recording or photography features on your phone)**

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: All counsel of record